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December 20, 2019

Via Email – [ejohnston@mcginnislaw.com](mailto:ejohnston@mcginnislaw.com)

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Via Email – [e.magee@allison-bass.com](mailto:e.magee@allison-bass.com)

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Via Email – [cass.weiland@sqwirepb.com](mailto:cass.weiland@sqwirepb.com)

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Via Email – [csmith@danielstarklaw.com](mailto:csmith@danielstarklaw.com)

Cory W. Smith  
Daniel Stark Law, PC  
P.O. Box 1153  
Bryan, Texas 77806

RE: *John Fairchild and Susie Fairchild, individually, and as Independent Administrators of, an on behalf of, the Estate of Kelli Leanne Page and the heirs-at-law of Kelli Leanne Page v. Coryell County, Texas, Steven Russell Lovelady, and Wesley Harland Pelfrey*; Civil Action No. 6:19-cv-00029; in the United States District Court for the Western District of Texas, Waco Division.

Dear Counsel:

I attach as Exhibit A a copy of my November 27, 2019 letter to you regarding Defendants supplementing certain discovery responses. I never received a response. I would appreciate prompt supplementation.

Specifically, with regard to Defendant Wesley Pelfrey, please supplement responses to Interrogatory Numbers 6 and 7, Request for Admission Numbers 14 through 17, and Request for Production Numbers 22, 25, 26, and 28. Regarding Defendant Steven Lovelady, please supplement responses to Interrogatory Numbers 6 and 7, Request for Admission Numbers 14 through 17, and Request for Production Numbers 22, and 25 through 28.

Sincerely,  


T. Dean Malone

TDM/cmr  
Attachments

Founders Square  
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November 27, 2019

Via Email – [ejohnston@mcginnislaw.com](mailto:ejohnston@mcginnislaw.com)  
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Mr. S. Cass Weiland  
Mr. Robert A. Hawkins  
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2000 McKinney Ave., Suite 1700  
Dallas, TX 75201

RE: *John Fairchild and Susie Fairchild, et al. v. Coryell County, Texas, et al.*;  
Civil Action No. 6:19-cv-00029; In the United States District Court for the  
Western District of Texas, Waco Division.

Dear Counsel:

As you know, Phase 2 discovery is beginning. Since the court has not ruled on summary judgment motions on the issue of qualified immunity, I left a voicemail message for Cass asking whether Defendants were interested in filing a motion extending certain time periods in the existing scheduling order. I did not receive a response and assume the Defendants intend to comply with dates in this current scheduling order.

Therefore, please forward to me all documents and responsive items which your clients did not produce in response to Plaintiffs' written discovery requests, due to the requests allegedly seeking responsive items related to issues other than qualified immunity. I would appreciate prompt supplementation, as I intend to take the County's deposition on *Monell* issues as well as possibly other depositions. I need responsive items to prepare for those depositions. I look forward to hearing from you.

Sincerely,  


T. Dean Malone

TDM/cmr

EXHIBIT

A